

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SONTERRA CAPITAL MASTER FUND, LTD;
HAYMAN CAPITAL MANAGEMENT, L.P.; and
CALIFORNIA STATE TEACHERS' RETIREMENT
SYSTEM, on behalf of themselves and all others similarly
situated,

Plaintiffs,

- against -

UBS AG, UBS SECURITIES JAPAN CO. LTD.;
MIZUHO BANK, LTD.; THE BANK OF TOKYO-
MITSUBISHI UFJ, LTD.; THE SUMITOMO TRUST
AND BANKING CO., LTD.; THE NORINCHUKIN
BANK; MITSUBISHI UFJ TRUST AND BANKING
CORPORATION; SUMITOMO MITSUI BANKING
CORPORATION; RESONA BANK, LTD.; J.P.
MORGAN CHASE & CO.; JPMORGAN CHASE
BANK, NATIONAL ASSOCIATION; J.P. MORGAN
SECURITIES PLC; MIZUHO CORPORATE BANK,
LTD.; DEUTSCHE BANK AG; DB GROUP SERVICES
UK LIMITED; MIZUHO TRUST AND BANKING CO.,
LTD.; THE SHOKO CHUKIN BANK, LTD.; SHINKIN
CENTRAL BANK; THE BANK OF YOKOHAMA,
LTD.; SOCIÉTÉ GÉNÉRALE SA; THE ROYAL BANK
OF SCOTLAND GROUP PLC; THE ROYAL BANK OF
SCOTLAND PLC; RBS SECURITIES JAPAN
LIMITED; RBS SECURITIES INC.; BARCLAYS
BANK PLC; BARCLAYS PLC; BARCLAYS CAPITAL
INC.; CITIBANK, NA; CITIGROUP, INC.; CITIBANK,
JAPAN LTD.; CITIGROUP GLOBAL MARKETS
JAPAN, INC.; COÖPERATIEVE CENTRALE
RAIFFEISEN-BOERENLEENBANK B.A.; HSBC
HOLDINGS PLC; HSBC BANK PLC; LLOYDS
BANKING GROUP PLC; LLOYDS BANK PLC; ICAP
PLC; ICAP EUROPE LIMITED; R.P. MARTIN
HOLDINGS LIMITED; MARTIN BROKERS (UK)
LTD.; TULLETT PREBON PLC; BANK OF AMERICA
CORPORATION; BANK OF AMERICA, N.A.;
MERRILL LYNCH INTERNATIONAL
INCORPORATED; AND JOHN DOE NOS. 1-50,
Defendants.

Docket No. 15-cv-5844 (GBD)

DECLARATION OF MARK CHAMBERS

I, Mark Chambers, declare and state as follows under penalty of perjury:

1. I am Deputy Group Company Secretary for HSBC Holdings plc.
2. In my capacity as Deputy Group Company Secretary for HSBC Holdings plc, I have personal knowledge of the matters set forth herein and believe them to be true and correct based on: (a) my work for HSBC Holdings plc, and (b) my review, or someone else's review at my direction, of relevant business records.
3. HSBC Holdings plc is a public limited company, incorporated under the laws of England and Wales, with its registered office in London, England.
4. HSBC Holdings plc is not incorporated in New York or in any other state in the United States.
5. HSBC Holdings plc currently has no offices, branches, or other regular place of business in New York or in any other state in the United States, and did not have any offices, branches or other regular places of business in New York or in any other state in the United States from the beginning of the putative class period (January 1, 2006) until present.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed in Hong Kong on January 29, 2016.



Mark Chambers
Deputy Group Company Secretary
HSBC Holdings plc